

Exhibit B



Deposition of:
Sanjeeva Kalva , M.D.

July 11, 2017

In the Matter of:
**In Re: Bard IVC Filters Products
Liability**

Veritext Legal Solutions

1075 Peachtree St. NE , Suite 3625

Atlanta, GA, 30309

800.808.4958 | calendar-atl@veritext.com | 770.343.9696

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1 anything like that.

2 Q. You also say that you reviewed the company
3 documents that are referenced in the reports of
4 Drs. Kessler and Betensky and Ritchie?

5 MR. JOHNSON: And Eisenberg, he said.

6 Q. And Eisenberg. Is that correct?

7 A. That's correct.

8 Q. And were those attached to their reports?

9 A. They were not attached. Whatever he quoted
10 inside the document, I read them. And corresponding
11 documents in the Dropbox, I reviewed them.

12 Q. So, if you were going to the actual document
13 that's quoted in Dr. Kessler or Betensky or
14 Eisenberg's report, you would be able to find that
15 document in the Dropbox?

16 A. I believe so.

17 Q. So there -- all of the company documents you
18 reviewed then --

19 A. Are in the Dropbox.

20 Q. -- are in the Dropbox; is that correct?

21 A. Uh-huh.

22 Q. Okay.

23 MR. NORTH: That's it.

24 MR. JOHNSON: He'll read.

25 MR. NORTH: We would just to put on the